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11 Attorneys for Plaintiffs
    ROBERT TRENT JONES II, INC.
12 ROBERT TRENT JONES LICENSING GROUP, LLC

13   **IN THE UNITED STATES DISTRICT COURT**
                NORTHERN DISTRICT OF CALIFORNIA
14   **SAN FRANCISCO DIVISION**

15

16 ROBERT TRENT JONES II, INC. and   **Case No. 07-CV-04913-EDL**
    ROBERT TRENT JONES LICENSING
17 GROUP, LLC   **NOTICE OF MOTION AND**
                                        ADMINISTRATIVE MOTION TO FILE
18   Plaintiffs,   **UNDER SEAL PURSUANT TO CIVIL**
                                        LOCAL RULES 7-11 AND 79-5 IN
19   v.   **CONNECTION WITH PLAINTIFFS'**
                                        MOTION FOR PRELIMINARY
20 GFSI, INC. d/b/a GEAR FOR SPORTS,   **INJUNCTION**
    INC.
21
                                        Magistrate Judge Elizabeth D. Laporte
22   Defendants.

23

24   PLEASE TAKE NOTICE that plaintiffs, Robert Trent Jones II, Inc. ("RTJ2, Inc.") and

25 Robert Trent Jones Licensing Group, LLC ("RTJ Licensing") file this Notice and Administrative

    Motion to File Under Seal the Declaration of Thomas B. Zetlmeisl. This declaration, a redacted

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NOTICE OF MOTION AND ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11
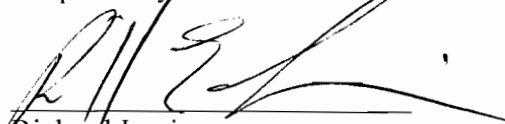AND 79-5 IN CONNECTION WITH PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

1   version of which will be lodged with the various other papers in support of Plaintiffs' Motion For

2   Preliminary Injunction, refers to and attaches exhibits disclosing the identities of Defendant

3   GFSI's customers, the prices certain of those customers pay for products sold by GFSI, and other

4   GFSI financial information.

5   Section 12.10 of the License Agreement between the parties, the alleged breaches of

6   which are the bases for certain of the claims for relief in this case, require the parties to

7   "maintain in confidence all Proprietary Information provided to each other . . . " A true and

8   correct excerpt of the License Agreement, containing said Section 12.10, is attached hereto as an

9   exhibit to the declaration of Richard E. Levine, Esq.

10   Plaintiffs submit this administrative motion in order to protect Defendant GFSI's rights,

11 should GFSI regard the material redacted from the Zetlmeisl Declaration and attached exhibits

12 (particularly GFSI's pricing information) proprietary. Plaintiffs do not, by moving to file this

13 material under seal, seek to vindicate or protect any of their own interests.

14   Submitted herewith, to be lodged with the Court, are (in sealed envelopes)

15 unredacted originals of the Zetlemeisl Declarations with unredacted exhibits, as well as the

16 redacted version that Plaintiffs propose be filed without sealing. Also submitted is the

17 Declaration of Mr. Levine attaching the relevant excerpt from the License Agreement. Finally,

18 submitted herewith is a proposed order.

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22   Respectfully submitted,

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24   Richard Levine
                            LEVINE & BAKER LLP

25   Joseph V. Norvell (pro hac vice pending)

NOTICE OF MOTION AND ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURUSANT TO CIVIL LOCAL RULES 7-11
AND 79-5 IN CONNECTION WITH PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

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Joseph T. Kucala (pro hac vice pending)
Jay M. Burgett (pro hac vice pending)
NORVELL IP LLC

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Attorneys for Plaintiff
ROBERT TRENT JONES II, INC.
ROBERT TRENT JONES LICENSING GROUP, LLC

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NOTICE OF MOTION AND ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURUSANT TO CIVIL LOCAL RULES 7-11
AND 79-5 IN CONNECTION WITH PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION